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July 9, 2003

Mary Cottrell, Secretary  
Department of Telecommunications and Energy  
One South Station  
Boston, Mass. 02202

RE: Massachusetts Electric Co. and Nantucket Electric Co. (MECo), DTE 03-2, 2003  
Energy Efficiency Plan

Dear Secretary Cottrell:

This is the petition to intervene of the Low-Income Energy Affordability Network (LEAN) and its members, including Action Inc. Members of LEAN include Community Action Programs (CAPs) incorporated in Massachusetts, which are community-based social service agencies that serve low-income consumers of electricity in Massachusetts who will be substantially affected by the proposed efficiency program (and those of other Massachusetts electricity utilities). LEAN is a voluntary association of CAP energy directors and others associated with the "low-income weatherization and fuel assistance program network" described in the electricity restructuring act (St. 1997, c. 164, sec. 37; G.L. c. 25, sec. 19).. Action Inc. is the CAP that serves the MECo service territory and delivers the proposed low-income efficiency program, as described in MECo's 2003 Energy Efficiency, sec. VII.B., filed in this docket..

Petitioners are substantially affected by the proposal in this docket in that (a) Action and other LEAN members will be called upon to deliver the program, (b) LEAN will be called upon to assist Action and other LEAN members in delivering the program, and (c) the clients served by Action and other LEAN members, with the assistance of LEAN, receive benefits from the proposed program that depend on the details of the program.

MECo has worked with LEAN and Action on the proposed efficiency budgets and programs and LEAN has joined in the Offer of Settlement in this docket.

If hearings are required, petitioners would present oral and documentary evidence with respect to compliance of the proposed efficiency program with the restructuring act, St. 1997, c. 164, the Department's rules and guidelines thereunder, particularly DTE 98-100, as well with G.L. c. 164. Relief sought would include approval of the 2003 Energy Efficiency Plan.

WHEREFORE, the Low-Income Energy Affordability Network and its members, including Action, Inc. petition to intervene in this docket.

Respectfully submitted,

The Low-Income Energy Affordability Network and its members including Action Inc.

By their attorney,

cc:

Amy Rabinowitz, Esq., MECo  
Elliott Jacobson, LEAN and Action Inc.  
Steven Venezia, Esq., DOER  
Bruce Ledgerwood, DOER  
Joseph Rogers, AG  
Non-utility parties by e-mail